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13 *Attorney for Plaintiff, Wells Fargo Bank, N.A., As Trustee For The Certificate Holders Of Park  
14 Place Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2005-WCW1*

15 **UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA**

17 WELL'S FARGO BANK, N.A., AS  
18 TRUSTEE FOR THE CERTIFICATE  
19 HOLDERS OF PARK PLACE SECURITIES,  
20 INC., ASSET-BACKED PASS-THROUGH  
21 CERTIFICATES, SERIES 2005-WCW1,

22 Plaintiff,  
23 vs.

24 COMMONWEALTH LAND TITLE  
25 INSURANCE COMPANY,

26 Defendant.

27 Case No.: 2:19-cv-00803-GMN-EJY

28 **STIPULATION TO EXTEND TIME TO  
RESPOND TO MOTION TO DISMISS  
[ECF NO. 46]**

29 **(Second Request)**

30 COMES NOW, Plaintiff, Wells Fargo Bank, N.A., as Trustee for the Certificate Holders  
31 of Park Place Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2005-WCW1  
32 (“Plaintiff”) and Defendant, Commonwealth Land Title Insurance Company (“Commonwealth”),  
33 by and through their respective undersigned counsels, stipulate and agree as follows:

- 34 1. On March 12, 2024, Commonwealth filed a Motion to Dismiss [ECF No. 46];  
35 2. Plaintiff’s deadline to respond to Commonwealth’s Motion to Dismiss is currently  
36 April 9, 2024 following an initial extension granted by this Court [ECF No. 50];  
37 3. Since the initial extension, on April 4, 2024, the Ninth Circuit Court of Appeals issued  
38 a memorandum decision in *Wells Fargo Bank, N.A. v. Commonwealth Land Title*

*Insurance Company*, Ninth Cir. Case No. 19-16181 (District Court Case No. 2:18-CV-00494-APG-BNW) (“*Wells Fargo*”). Plaintiff requires additional time to assess any potential impact of *Wells Fargo* on this matter;

4. Accordingly, good cause exists to grant a one-week extension up to and including April 16, 2024 for Plaintiff to file its response to Commonwealth's Motion to Dismiss;
  5. Counsel for Commonwealth does not oppose the requested extension;
  6. This is the second request for an extension and is made in good faith and not for purposes of undue delay or prejudice.

## **IT IS SO STIPULATED.**

DATED this 9<sup>th</sup> day of April, 2024.

DATED this 9<sup>th</sup> day of April, 2024.

## WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN KARGHER LLP

/s/ Yanxiong Li, Esq.

/s/ Kevin S. Sinclair, Esq.

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*Attorneys for Plaintiff, Wells Fargo*

*Attorneys for Defendant, Commonwealth*

*N.A., As Trustee For The Ce*

## *Land Title Insurance Company*

*Of Park Place Securities, Inc., Asset-Backed  
Bonds. The Bonds are Classified as Series 2005.*

# *Pass-Through Certificates, Series 2005-HCWII*

WCWI

## **IT IS SO ORDERED.**

DATED: April 9, 2024

  
John J. Quinn  
DISTRICT COURT JUDGE